IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF VIRGINIA

DIVISION

\*

Plaintiff \*

\*

v \* Civil Action No.

\*

\*

\*

Defendant \*

COMPLAINT

(Auto Collision-John Doe)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff is a citizen of the state of and resides at the address listed in the caption of this matter.

2. The defendant, John Doe, is an unknown motorist who was operating the other vehicle involved in the collision in question in this action. At the time of this collision, the plaintiff was insured under the uninsured motorist provisions of a motor vehicle policy issued by the Insurance Company. Process is served upon this insurance carrier pursuant to the applicable Virginia code section. The defendant was operating a motor vehicle with license plates from the state of and as such is believed to be a citizen and resident of a state other than where the plaintiff is a citizen.

3. This Court has subject matter jurisdiction over this matter pursuant to 28 USC 1332(a) due to the diversity of citizenship of the parties and because the amount in controversy exceeds $50,000.00 exclusive of interest and costs.

4. Venue is appropriate in this Federal district under 28 USC 1391 due to the fact that the incident in question occurred in this district.

5. This Court has personal jurisdiction over the defendant pursuant to Virginia Code 8.01-328.1 due to the fact that the defendant .

6. On , a vehicle operated/occupied by the plaintiff was involved in a motor vehicle collision with the vehicle operated by the defendant at .

7. The collision was proximately caused by the negligence of the defendant.

8. The defendant was negligent in that and for such other reasons as may be adduced during the discovery process or at trial.

9. The collision proximately caused certain property damage to the vehicle owned by the plaintiff.

10. The collision also proximately caused certain injuries and damages to the plaintiff, including but not limited to medical and hospital expenses incurred, loss of use of the affected body parts, loss of income, and pain and suffering, some or all of which continue up to the present time and may be continuing or permanent in nature.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , plus an award of costs and interest.

JURY DEMAND

The plaintiff requests trial by jury as to all issues.

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**Interrogatories and Request for Documents are served along with this Complaint**